

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	Case No. 3:15-CR-148
vs.	:	
	:	
WILLIAM M. APOSTELOS,	:	Judge Thomas Rose
	:	
Defendant.	:	

**MOTION TO CONTINUE TRIAL DATE**

Comes the defendant, William Apostelos, through counsel, and respectfully requests that the Court continue the trial date currently scheduled for February 6, 2017. Mr. Apostelos asks this Court for this brief continuance in order to adequately prepare this complex case for trial, and in order to have adequate time to review a government document recently presented to Mr. Apostelos. The preparation of the defense requires additional time due to the complex and voluminous nature of the discovery in this case, as well as the number of anticipated witnesses who will be testifying at trial, and Mr. Apostelos argues that the ends of justice in granting the defendant's motion outweigh the public's interest in a speedy trial.

Wherefore, Mr. Apostelos requests that this Court continue the Trial date scheduled for February 6, 2017 and toll the speedy trial clock until April 4, 2017.

Respectfully submitted,

DEBORAH L. WILLIAMS,  
FEDERAL PUBLIC DEFENDER

s/F. Arthur Mullins  
F. Arthur Mullins (0080483)  
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Attorney for Defendant  
William Apostelos

  
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William Apostelos

**CERTIFICATE OF SERVICE**

I hereby certify that on January 20, 2017, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

s/F. Arthur Mullins  
F. Arthur Mullins